

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

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Case No.: 1:22-cv-1032 (PKC) (JRC)

**SUPPLEMENTAL DECLARATION
OF JAMIE S. FELSEN, ESQ.**

Jamie S. Felsen, Esq. declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am admitted to practice before this Court and am a member of Milman Labuda Law Group PLLC, who – along with Sage Legal LLC – are the attorneys for Plaintiff IME WatchDog, Inc. (“IME WatchDog”) in this case.

2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge and a review of the file maintained by this office.

3. A copy of the transcripts for the hearings referred to in Plaintiff’s closing argument are linked herein as follows:

- a. March 27, 2023 hearing transcript, ECF Docket Entry [197-5](#).
- b. May 4, 2023 hearing transcript, ECF Docket Entry [219-1](#).
- c. May 29, 2024 hearing transcript, ECF Docket Entry [355-1](#).
- d. July 29, 2024 hearing transcript annexed hereto as **Exhibit “A”**.

4. Annexed hereto as **Exhibit “B”** is a copy of an invoice produced by Subin & Associates (“Subin”) in response to a subpoena along with a declaration from Subin & Associates certifying the records. This is the same invoice that Safa falsely testified was fabricated by Carlos Roa.

5. A copy of **Hearing Exhibit 39** is annexed hereto as **Exhibit “C”**.

6. A copy of **Hearing Exhibit 45** is annexed hereto as **Exhibit “D”**.

7. A copy of **Hearing Exhibit 52** is annexed hereto as **Exhibit “E”**.

8. A copy of **Hearing Exhibit 53** is annexed hereto as **Exhibit “F”**.

9. A copy of **Hearing Exhibit 54** is annexed hereto as **Exhibit “G”**.

10. A copy of **Hearing Exhibit 60** is annexed hereto as **Exhibit “H”**.

11. A copy of **Hearing Exhibit 64** is annexed hereto as **Exhibit “I”**.

12. A copy of **Hearing Exhibit 66** is annexed hereto as **Exhibit “J”**.

13. A copy of **Hearing Exhibit 72** is annexed hereto as **Exhibit “K”**.

14. A copy of **Hearing Exhibit 76** is annexed hereto as **Exhibit “L”**.

15. For the 4/10/23 virtual meeting, see ECF Docket Entries [355-5](#) and [355-6](#)

16. For a copy of 9/25/24 Hearing, EX 1 2023-04-10.wav see <https://www.dropbox.com/scl/fi/hnc60fhqs8iso7kshokbj/EX-1-2023-04-?e=1>

17. A copy of **Hearing Exhibit 37** is annexed hereto as **Exhibit “M”**.

18. For a copy of 9/25/24 Hearing, EX 2 2023-04-11.wav see <https://api.twilio.com/2010-04-01/Accounts/AC61504971730ea0f771cf824bfe1d967d/Recordings/RE4d72530a6e785918b00b06bf0dcc33ca>

19. Annexed hereto as **Exhibit N** is a true and correct copy of the results of a search for Client Exam Services LLC on the New York State Department of State Division of Corporations website establishing that Client Exam Services LLC's initial Department of State filing was on March 16, 2023.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 25, 2024.

/s/ Jamie S. Felsen
Jamie S. Felsen, Esq.